

REMARKS/ARGUMENTS

These remarks are submitted in response to the Office Action dated July 30, 2007 (Office Action). This response is filed within the 3-month shortened statutory period, and as such, no fees are believed to be due. The Examiner is expressly authorized, however, to charge any deficiencies or credit any overpayment to Deposit Account No. 50-0951.

Claims 1-33 were rejected under 35 U.S.C. § 112, first paragraph. Claims 1-12 and 22-33 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Published Patent Application No. 2001/0042083 to Saito, *et al.* (hereinafter Saito), in view of U.S. Patent 6,073,148 to Rowe (hereinafter Rowe), and further in view of U.S. Patent 5,911,776 to Guck (hereinafter Guck). Claims 13-21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Saito in view of Guck.

Rejections under 35 USC § 112

In the Office Action, Claims 1-33 were rejected under 35 U.S.C. § 112, first paragraph. In this response, Claims 1, 13, 14, 22, and 33 have been amended to address the issues identified in the Office Action. Accordingly, Applicants respectfully request that the rejections be withdrawn.

Amendments to the Claims

Although Applicants respectfully disagree with the rejections asserted in the Office Action based on the cited references, Applicants nonetheless have amended the claims so as to expedite prosecution by further emphasizing certain aspects in the claims. Applicants respectfully assert, however, that the amendments should not be interpreted as the surrender of any subject matter. Applicants are not conceding by these amendments that any previously submitted claims are not patentable over the references of record. Applicants' present claim amendments are only submitted for purposes of facilitating expeditious prosecution of the present Application. Accordingly, Applicants reserve the right to pursue any previously submitted claims in one or more continuation and/or divisional patent applications.

In this response, applicants have amended the claims to emphasize certain aspects. In particular, the independent claims have been amended to recite the limitation that the template includes not only offset information for locating data in a specified document, but also can include at least one among markup language tags, code, or additional text that needs to be associated with the extracted data when presenting it in the target markup language format. Additionally, Applicants have amended the independent claims, to emphasize that the desired conversion is from one markup language ("first") to another markup language ("target"). Such amendments are fully supported throughout the Specification. (See, e.g., pg. 24, discussing tags, codes, or text, lines 10-12; pg. 11, lines 2-10, discussing invention in general.)

Aspects of the Claims

Prior to discussing the cited references, it may be useful to discuss certain aspects of the claims. The claims, as amended, recite systems and methods for converting formatted content, specifically, converting content from one markup language format to another. A method, as typified by Claim 1, can include the step of receiving a content request from a remote client. The content request not only specifies a network location for a document in a first markup language format to be retrieved, but also includes a second target markup language format in which the document should be delivered to the client. The method can further include the step of identifying a template corresponding to the specified document and the target format.

A template can be identified or located based on identifier corresponding to the network location. Furthermore, the template can include content markers used to provide data offset for identifying within the specified document data fields associated with types of data or particular actions. The template can also include information regarding markup language tags, code, and additional text needed to present the information in the data fields in the target format.

In the method, once the document location is accessed, the template can be applied by identifying a presentation order for the template markers and extracting the information

in the presentation order. Finally, a second document, in the second target markup language format, can be produced by formatting the extracted information for an audible presentation by using any associated tags, code, or additional text.

The Claims Define Over the Cited References

In the Office Action, independent Claims 1, 13, 14, 22, and 33 were rejected as being unpatentable over Saito in view of at least Guck. Saito discloses a system and method for extracting information for a database from documents using templates. Guck discloses a system and method for using shadow files to retrieve content and format information from a database. However, Applicants respectfully submit that the claims define over these and other references of record.

First, Saito fails to disclose identifying a template, including the limitations recited, that corresponds to a ***specified*** document that includes content in a first markup language. As noted above, Saito discloses systems and methods for extracting information from documents based on templates. The templates in Saito are not associated with a particular document, but with particular ***types*** of documents. Saito explicitly notes that the content of the documents to which the templates are to be applied is unknown. (See, e.g., FIG. 1 and FIG. 2.) Instead, Saito relies on a known or expected physical arrangement of the pages in the document. Accordingly, the templates in Saito are not associated with a particular document, rather the templates are associated by the user with a plurality of possible documents. In contrast, the claims explicitly recite a template associated with a particular document, not with a group of documents.

Second, Saito fails to disclose or suggest the use of content marker to indicate the location of data fields in a particular document. Although Saito discloses that a template can include identification of physical regions containing data, such "markers" are not equivalent. In particular, the markers in Saito are different from the marker recited in the claims in that that Saito's markers do not identify the location of a particular data field. Instead, Saito's markers only identify the ***possible*** location of a particular data field, as the markers in Saito are only associated with a physical region of the document. Accordingly,

the identified regions may or may not have data. Therefore, instead of identifying information that can be retrieved, Saito's markers are essentially used only to determine what to do with the information that is retrieved from a specific physical region of the document. In contrast, the claims explicitly recite the limitation that markers specifically identify locations of actual data in the document.

Such a limitation is asserted in the Office Action to be disclosed in Rowe. However, Applicants respectfully submit that even in combination with Rowe, Saito does not disclose the limitation. As discussed above, Saito is directed at the use of templates to identify regions within an entire unknown document that might contain information for a database. In the cited portion, Rowe discloses a system and method for selecting a portion of a document to display using offsets. Therefore, applying an offset in a template of Saito to identify portions of documents still only provides the possible physical location on a page for data and does not provide the precise location of information in a document. This also points out a fundamental difference between Saito and the claims. The claims recite that locations of particular information in particular documents are known *a priori*. Saito only discloses possible locations; a user of Saito is never sure if the location, regardless or how it is referenced in the template, contains the information desired.

Finally, Saito fails to disclose a template that associates markup language tags, code, or additional text with a particular data field for presentation in the second markup language. In Saito, the templates are provided specifically to identify locations of data in order to populate a database, nothing more. Although the templates in Saito can indicate the locations in the database that are to be used to store the extracted data, nowhere does Saito disclose or suggest that the templates provides for inserting additional information with the entries, such as markup language tags, code, or additional text. The claims explicitly recite the limitation that the templates indicate not only the location of data within a specified document, but also identify specific tags, code, or additional text that needs to be associated with the data when presenting it in the second target format.

Accordingly, Saito, alone or in combination with any other reference of record, fails to disclose, suggest, or render obvious each and every element of the independent claims, as amended. Therefore, Applicants respectfully submit that the independent claims define over the references of record. Furthermore, as the remaining claims each depend from one of the independent claims while reciting additional features, Applicants submit that the dependent claims likewise define over the references of record.

CONCLUSION

Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

Date: **October 30, 2007**

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